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TIKTOK INC. and BYTEDANCE INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION,

Case No. 4:22-MD-03047-YGR

MDL No. 3047

### This Document Relates to:

**DECLARATION OF JORI M. LOREN  
IN RESPONSE TO MAGISTRATE  
JUDGE KANG'S MAY 30, 2025 ORDER**

## *Personal Injury Bellwether Plaintiffs*

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

## **DECLARATION OF JORI M. LOREN**

Pursuant to 28 U.S.C. § 1746, I, Jori M. Loren, declare as follows:

1. I am an attorney at Faegre Drinker Biddle & Reath LLP, and counsel for Defendants TikTok Inc. and ByteDance Inc. in the above-referenced matter. I make this declaration in response to the Court's May 30, 2025 Order regarding the parties' Joint Letter Brief regarding ESI requested from certain Bellwether Plaintiffs (Dkt. 1957). I have personal knowledge of the following facts and, if called as a witness in the above-referenced action, could competently testify to the matters stated herein.

1       2. Attached hereto as **Exhibit A** is a true and correct copy of a March 26, 2025 email  
2 sent by my colleague, Nikolas Spilson, that requested documents from certain data sources used by  
3 Plaintiff Klinten Craig.

4       3. Attached hereto as **Exhibit B** is a true and correct copy of a March 26, 2025 email  
5 sent by Jesse S. Krompier of Morgan, Lewis, & Bockius LLP that requested documents from certain  
6 data sources used by Plaintiff Leslie Smith.

7       4. Attached hereto as **Exhibit C** is a true and correct copy of a March 26, 2025 email  
8 sent by Haley R. Klein of Kirkland & Ellis that requested documents from certain data sources used  
9 by Plaintiff David Melton.

10       5. Attached hereto as **Exhibit D** is a true and correct copy of a March 27, 2025 email  
11 sent by my colleague, Thomas R. Prible, that requested documents from certain data sources used  
12 by Plaintiff Dymand McNeal.

13       6. Attached hereto as **Exhibit E** is a true and correct copy of a March 27, 2025 email  
14 sent by my colleague, Emma DeLaney Strenski, that requested documents from certain data sources  
15 used by Plaintiff Jessica D'Orazio.

16       7. Attached hereto as **Exhibit F** is a true and correct copy of a March 27, 2025 email  
17 sent by James R. Hampton of Shook, Hardy & Bacon LLP that requested documents from certain  
18 data sources used by Plaintiff M.G.

19       8. Attached hereto as **Exhibit G** is a true and correct copy of a March 28, 2025 email  
20 sent by Cara Souto of Covington & Burling LLP that requested documents from certain data  
21 sources used by Plaintiff Laurel Clevenger.

22       9. Attached hereto as **Exhibit H** is a true and correct copy of a March 28, 2025 email  
23 sent by Stephanie Schuster of Morgan, Lewis, & Bockius LLP that requested documents from  
24 certain data sources used by Plaintiff J.D.

25       10. Attached hereto as **Exhibit I** is a true and correct copy of a March 28, 2025 letter  
26 from me that, among other things, requested documents from certain data sources used by Plaintiff  
27 Nuala Mullen.

11. Attached hereto as **Exhibit J** is a true and correct copy of a March 28, 2025 email sent by my colleague, Jessica Tabibian, that transmitted my March 28, 2025 letter.

12. I am unaware of additional correspondence responsive to the Court's May 30, 2025 Order.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 2, 2025.

/s/ Jori M. Loren  
Jori M. Loren, *pro hac vice*  
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